

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**MOTION FOR USE OF ELECTRONIC EQUIPMENT IN THE  
COURTROOM DURING TRIAL**

Plaintiffs Donna Curling, Donna Price and Jeffrey Schoenberg (the “Curling Plaintiffs”) respectfully move for entry of an Order authorizing the Curling Plaintiffs’ trial team to bring the following electronic equipment into the Federal Courthouse starting Monday, January 8, 2024, for set up and during the remainder of the trial through January 31, 2024, before the Honorable Amy Totenberg in Courtroom 2308 of the above-captioned Court.

Curling Plaintiffs’ attending counsel include Halsey G. Knapp, Jr., Adam Sparks, David Cross, Mary Kaiser, Christian Andreu-von Euw, Ramsey Fisher, Matthaeus Martino-Weinhardt, Aaron Scheinman, Benjamin Campbell; and attending paralegals and legal support staff members: Daniella Stucchi, Lauren Brown, Ben Winstead, Jenna Conaway, Amira Ali, and Troy Parker.

Curling Plaintiffs request that their legal team be permitted to bring in the following items as needed:

- 17 laptop computers with power cords and computer mice
- 22 smart phones with power cords (personal devices will be silenced)
- 2 tablet computers (e.g., Apple iPad, Microsoft Surface Pro) with power cords
- 7 smartwatches
- 3 Mobile hotspot MIFI devices
- 7 USB drives
- VGA/HDMI switches
- 4 portable cellphone battery chargers
- Power strips, extension cords, and computer cabling (HDMI, etc.)
- 1 external monitor screen
- 1 laptop docking station
- 1 small folding table
- 2-4 portable plastic bookshelves
- 2 additional printers with associated cabling
- Dominion ImageCast X (ICX) BMD (including associated charging devices, cords, cables, USB drives, and smart cards)
- HP LaserJet printer (including associated cords and cables)
- ImageCast Precinct (ICP) Scanner (including all associated charging devices, cords, cables, security key, and memory cards)

beginning on Monday, January 8, 2024 and continuing for the remainder of the trial through January 31, 2024.

Curling Plaintiffs request that Anthony Barko of Impact Trial Consulting LLC (Curling Plaintiffs' Trial Technician) be allowed to bring in the following items as needed:

- 2 laptop computers with laptop power cords and computer mice
- 2 smart phones with smartphone power cords
- 1 external monitor screen
- 1 video matrix switcher
- HDMI cables (various)
- Adapters & power supplies (various)
- 2 presentation clickers
- Small technician table
- Mobile hotspot MIFI device
- 2 USB drives

beginning on Monday, January 8, 2024 and continuing for the remainder of the trial through January 31, 2024.

Curling Plaintiffs request that Dr. J. Alex Halderman and Dr. Andrew "Drew" Springall be allowed to bring in the following items as needed:

- 2 laptop computers with power cords
- 2 smart phones with power cords

- 2 smart watches

beginning on Monday, January 8, 2024 and continuing for the remainder of the trial through January 31, 2024.

The Curling Plaintiffs additionally request that Donna Curling, Donna Price, and Jeffrey Schoenberg be permitted to bring in the following items:

- 3 smart phones with power cords
- 3 smart watches

beginning on Monday, January 8, 2024 and continuing for the remainder of the trial through January 31, 2024. Donna Price uses an application on her smartphone to provide personal audio accommodation in order to hear the proceedings due to hearing loss. Donna Curling and Jeffrey Schoenberg need access to their smartphones during extended trial days to attend to important personal obligations, including ensuring care for others for whom they are responsible.

The Curling Plaintiffs submit that good cause exists to grant this Motion, and request that this authorization for their counsel: Halsey G. Knapp, Jr., Adam Sparks, David Cross, Mary Kaiser, Christian Andreu-von Euw, Ramsey Fisher, Matthaeus Martino-Weinhardt, Aaron Scheinman, Benjamin Campbell; attending paralegals and legal support staff members: Daniella Stucchi, Lauren Brown, Ben Winstead, Jenna Conaway, Amira Ali, and Troy Parker; Trial Technician Anthony Barko; Dr. J. Alex Halderman; Dr. Andrew “Drew” Springall; Donna Curling;

Donna Price; and Jeffrey Schoenberg extend through completion of the trial, at the Court's discretion.

WHEREFORE the Curling Plaintiffs respectfully request that this Court enter an Order GRANTING this Motion and the relief it requests.

A proposed Order is attached hereto as Exhibit A.

Respectfully submitted, this 4th day of January, 2024.

/s/ David D. Cross

David D. Cross (*pro hac vice*)  
Mary G. Kaiser (*pro hac vice*)  
Matthaeus Martino-Weinhardt  
(*pro hac vice*)  
Ramsey Fisher (*pro hac vice*)  
Aaron Scheinman (*pro hac vice*)  
Benjamin Campbell (*pro hac vice*)  
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/s/ Halsey G. Knapp, Jr.

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/s/ Christian G. Andreu-von Euw

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*Counsel for Plaintiffs Donna Curling, Donna Price & Jeffrey Schoenberg*

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**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

**/s/ Adam M. Sparks**

Adam M. Sparks

*Counsel for Curling Plaintiffs*

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 4, 2024, a copy of the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

**/s/ Adam M. Sparks**

Adam M. Sparks

*Counsel for Curling Plaintiffs*